



CenturyLink™

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

EX PARTE NOTICE

Re: Developing a Unified Inter-carrier Compensation Regime, CC Dkt. 01-92; High-Cost Universal Service, WC Dkt. 05-337; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Dkt. 07-135; A National Broadband Plan for Our Future, GN Dkt. 09-51; Connect America Fund, WC Dkt. 10-90

Dear Ms. Dortch:

On January 26, 2011, David Bartlett and I, on behalf of CenturyLink, met separately with Margaret McCarthy in the Office of Commissioner Copps and Michael Steffen in the Office of General Counsel to discuss the intercarrier compensation and universal service reform notice of proposed rulemaking scheduled for February 8. CenturyLink agreed that intercarrier compensation reform and high-cost universal service reform are critical to broadband deployment and expressed general agreement with the National Broadband Plan framework.

In particular, CenturyLink explained the importance to the Commission's broadband deployment goals of preserving and making explicit the high-cost support reflected in access charges. In addition, we explained the need for all carriers to compensate each other for the costs associated with using network facilities, which are particularly important with respect to higher-cost rural transport networks. CenturyLink explained that the Commission must take action promptly on the interim measures of phantom traffic, traffic pumping, and IP-PSTN access compensation to build confidence that the Commission and stakeholders can make progress on intercarrier compensation reform.

CenturyLink emphasized that the Commission's reform efforts must follow a "fifth pillar" of doing away with unfunded mandates. In addition, CenturyLink encouraged the Commission not to become distracted with pilot programs for broadband support but, rather, to move directly to establishing a Connect America Fund. During the transition, existing access replacement could be tied to new broadband deployment rather than diverted. With respect to the treatment of IP-originated traffic, CenturyLink emphasized the need to ensure revenue stability during the transition to a new universal service and intercarrier compensation regime.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the above-referenced dockets. Please contact me if you have any questions.

Sincerely,

Jeffrey S Lanning

cc: Margaret McCarthy, Michael Steffen